

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

<hr/>	:	MDL NO. 2342
	:	
IN RE: ZOLOFT (SERTRALINE	:	12-MD-2342
HYDROCHLORIDE) PRODUCTS	:	
LIABILITY LITIGATION	:	HON. CYNTHIA M. RUFE
	:	
<hr/>	:	
THIS DOCUMENT RELATES TO:	:	
	:	
<i>All Actions Listed in Appendix A</i>	:	
	:	
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STIPULATION OF DISMISSAL

TO THE CLERK OF THE COURT:

The plaintiffs listed in Appendix A (collectively “Plaintiffs”) and Pfizer Inc.¹ (“Defendant”) hereby stipulate, pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure for the United States District Courts, that the actions be dismissed, without prejudice and without costs or fees to any party, subject to Plaintiffs’ agreement to the following conditions:

- (1) Any re-filing of any claims against the Defendant will be in federal court only and only in the form of a single plaintiff-family Complaint.
- (2) Plaintiffs will not oppose transfer of any re-filed action to any MDL involving similar Zoloft claims for pre-trial proceedings.
- (3) In any re-filed action, the Plaintiffs shall attach as an exhibit to the Complaint a Rule 26 expert report supporting their claim that the mother’s use of Zoloft during pregnancy caused or contributed to cause the minor plaintiff’s injury.

¹ Defendant Greenstone LLC joins the parties in all applicable actions.

DATED: June 26, 2015

/s/ Steven D. Davis

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Respectfully submitted,

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*Attorneys for Defendants Pfizer Inc. and
Greenstone LLC*

SO ORDERED this _____ day of _____, 2015.

HON. CYNTHIA M. RUFE

Appendix A

	Case	MDL No.
1.	Kyles v. Pfizer Inc., et al.	15-3103
2.	Paglia v. Pfizer, Inc.	15-2018
3.	Sides v. Pfizer, Inc.	15-3104

CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which shall send electronic notification of such filing to all CM/ECF participants.

DATED: June 26, 2015

/s/ Steven D. Davis
Steven D. Davis